COMMONWEALTH OF MASSACHUSETTS Department of Telecommunications and Energy

RESPONSE OF THE ATTORNEY GENERAL TO THE SECOND SET OF INFORMATION REQUESTS FROM THE BAY STATE GAS COMPANY DTE 05-27

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-12 Please refer to the Cavallo Testimony at 4, lines 4-11. Please provide Mr. Cavallo's professional vitae and list in particular the dates and descriptions of actual assignments described in that paragraph, including the names of each client for whom Mr. Cavallo's work was undertaken.

Response: A copy of Mr. Cavallo's CV is attached to this response.

Alyeska Pipeline Service Company (early 1980's) – investigated pinhole corrosion of 42 in dia pump station piping and developed means and methods for reworking the exterior corrosion protection of the affected piping.

Voice of America facility at Sao Tome and Principe (2001) – conducted a site-wide corrosion survey of atmospheric and buried structures, and developed a prioritized program for corrosion mitigation.

Voice of America facility at Botswana (2005) – conducted a site-wide corrosion survey of atmospheric and buried structures, and developed a prioritized program for corrosion mitigation.

Duke Energy Catawba Nuclear Station (2005) – served on the Independent Review Team formed to review the efficacy of the internal and external corrosion mitigation plans for the buried service water coating system.